FILED
BRYAN MUNICIPAL COURT
Nov 17, 2025 - 09:31:32 AM

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

State of Ohio, : Case No. CRB2400102
Plaintiff, :
: Judge North
v. :
: MOTION TO SEAL ADA FILING AND
Jeremy Lee Shepherd, : SUPPORTING DOCUMENTS DUE TO
Defendant. : PROTECTED MEDICAL CONTENT

Now comes Defendant, Jeremy Lee Shepherd, and respectfully moves this Honorable Court to seal from public access the Americans with Disabilities Act (ADA) request for accommodation filed on November 14th 2025, along with all supporting documentation attached thereto.

This motion is brought pursuant to:

- Title II of the Americans with Disabilities Act (42 U.S.C. § 12132),
- Implementing regulations under 28 C.F.R. § 35.130(b)(7),
- Ohio case law permitting sealed records for sensitive matters,
- And the Court's inherent authority to manage and restrict access to court records where justice and privacy so require.

In support, Defendant states the following:

1. The ADA filing and accompanying documents contain sensitive medical and federally protected disability-related information, including mental health references and documentation of SSDI benefits.

2. Public disclosure of these materials presents a risk of stigma, reputational harm, emotional distress, and potential retaliation against the Defendant.

3. The content of these filings is not essential for public oversight of the proceedings and is irrelevant to any prosecutorial, judicial, or public interest outside the scope of this Court's ADA compliance obligations.

4. The ADA and associated federal privacy regulations provide that disability-related requests and documentation be handled with discretion and confidentiality.

WHEREFORE, Defendant respectfully requests the Court to:

A. Seal from public view the ADA filing submitted on November 14th 2025 and all supporting documents attached;

B. Direct the Clerk of Court to restrict public access to those filings, making them available only to the Court, the parties, and their attorneys;

C. Order that any future filings involving protected medical or disability-related material be similarly sealed by default unless otherwise directed.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd
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Defendant, Pro Se